

SPEARS & IMES LLP

767 Third Avenue  
New York, NY 10017  
tel 212 213-6996  
fax 212 213-0849

Reed M. Keefe  
tel 212-897-4485  
rkeefe@spearsimes.com

May 9, 2023

**BY ECF**

The Honorable P. Kevin Castel  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Application Granted.

So Ordered:

  
Hon. P. Kevin Castel, U.S.D.J.  
5 - 9 - 23

Re: *United States v. Andrew Brown, S1 20 Cr. 470 (PKC)*

Dear Judge Castel:

We respectfully write on behalf of Andrew Brown to request that the restrictions on his travel be modified to allow him to travel to the Northern District of New York on Friday, May 12 and to return the same day. The Court has previously ruled that Mr. Brown may make requests to travel to the Northern District of New York on a case-by-case basis. (ECF No. 60.)

We make this request because Mr. Brown would like to pick his son up from college in Cortland, New York at the end of his son's school term. The Pretrial Services Officer supervising Mr. Brown has no objection to this request, as long as Mr. Brown provides his travel itinerary. The Government also does not object.

Thank you for your consideration of this request.

Respectfully submitted,

/s Reed M. Keefe

Max Nicholas  
Reed M. Keefe  
Attorneys for Andrew Brown

cc: All Counsel via ECF